

Amy Baggio, OSB #011920
amy@baggiolaw.com
Baggio Law
621 SW Morrison, Suite 1025
Portland, OR 97205
Tel: (503) 222-9830
Fax: (503) 274-8575

Attorney for Defendant O'Shaughnessy

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

UNITED STATES OF AMERICA,

Case No. 3:16-cr-00051-BR

Plaintiff,

v.

**AMMON BUNDY, JON RITZHEIMER,
JOSEPH O'SHAUGHNESSY, RYAN
PAYNE, RYAN BUNDY, BRIAN
CAVALIER, SHAWNA COX, PETER
SANTILLI, JASON PATRICK, DUANE
LEO EHMER, DYLAN ANDERSON,
SEAN ANDERSON, DAVID LEE FRY,
JEFF WAYNE BANTA, SANDRA LYNN
PFEIFER ANDERSON, KENNETH
MEDENBACH, BLAINE COOPER,
WESLEY KJAR, COREY LEQUIEU,
NEIL WAMPLER, JASON CHARLES
BLOMGREN, DARRYL WILLIAM
THORN, GEOFFREY STANKE, TRAVIS
COX, and ERIC LEE FLORES**

**JOINT STATUS REPORT ON
DISCOVERY MANAGEMENT**

Defendants.

The defendants, through Amy Baggio, and the government, through AUSA Craig Gabriel, submit the following Joint Status Report On Discovery Management, in accordance with the Court's Order of March 9, 2016 (Docket No. 285, Sealed).

CERTIFICATION OF CONFERRAL: Undersigned counsel certifies that Assistant United States Attorney Craig Gabriel was provided a copy of, and consulted regarding the content of, this Joint Status Report On Discovery Management. The government positions as to the processes requested in this Status Report are set forth below.

The parties, through Amy Baggio on behalf of the defendants¹, and the government through AUSA Craig Gabriel, submit the following joint status report regarding the process for the government to make the discovery available to all defendants, in accordance with the Court's Case Management Order of March 9, 2016 (Docket No. 285, Sealed). The government states that discovery will be produced in multiple formats, and derived from different sources, including but not limited to text documents, photographs, audio recordings, video recordings, images from electronic devices, and captures from traditional and social media. The government anticipates providing multiple terabytes of digital data, perhaps up to six or ten. To ensure timely, complete, and efficient production of discovery, the parties propose the following for the government's provision of discovery in this matter:

Joint Proposal Regarding Discovery Management

- A. The government will continue to send an email to each lead defense attorney on the case and the CJA Panel Office when each volume of discovery is ready for release;

¹ Because counsel for Joseph O'Shaughnessy has been unable to have any communication with him since March 3, 2016, when he was arrested in Phoenix, Arizona, on the Nevada indictment, Ms. Baggio can make no representations on Mr. O'Shaughnessy's behalf. Undersigned counsel is filing this report in her role as coordinating panel attorney.

- B. The government will confer with the CJA Panel Office in advance of producing discovery, and provide notice to the Panel Office, when possible, as to the nature and size of the expected production;
- C. In terms of actual production of subsequent volumes of discovery, the government will send one copy to the CJA Panel Office, after conferring with the CJA Panel Office, for hosting and organizing by a third-party vendor.²

Additional Defense Request Regarding Discovery

As to Item C, above, the defense further requests that the government provide one copy of each distribution of discovery to each individual defense attorney who requests it, on a defense-provided external hard drive.

The government objects to this request.

Respectfully submitted on March 23, 2016.

/s/ Amy Baggio
Amy Baggio, OSB #011920
503-222-9830
Attorney for Defendant O'Shaughnessy

² The CJA Panel Office is in the process of retaining a third party vendor. Necessary paperwork related to those efforts will be submitted to the Court in the normal course for budget approval.